

CALIFORNIA CIVIL RIGHTS LAW GROUP

Lawrence A. Organ (SBN 175503)
Navruz Avloni (SBN 279556)
332 San Anselmo Avenue
San Anselmo, California 94960-2664
Telephone: (415) 453-4740
Facsimile: (415) 785-7352
larry@civilrightsca.com
navruz@civilrightsca.com

Attorneys for Plaintiffs,
DEMERIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMERIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

V.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive.

Defendants.

Case No. 3:17-cv-06748-WHO

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT TESLA, INC.'S MOTION
TO RETAIN CONFIDENTIALITY**

Date: January 8, 2020

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 2017

MOTION

Pursuant to Local Rules 7-11 and 79-5, as well as Judge Orrick's Standing Order regarding administrative motions to seal, Plaintiffs Demetric Di-az and Owen Diaz respectfully request an order sealing the physical copies in the Court's files of Exhibits 1 through 46 to the Supplemental Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant Tesla, Inc.'s Motion to Retain Confidentiality. This Motion is based on the Declaration of Lawrence Organ in support thereof, and the documents to be sealed are laid out below:

Exhibit	Bates Number	Designating Party	Basis for Sealing
1	TESLA0000185-186	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
2	TESLA0000140-142	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
3	TESLA000004-8	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
4	TESLA0000805-808	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
5	TESLA0000844-849	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
6	TESLA0000889	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
7	TESLA0000211-9	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
8	TESLA0000308	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
9	TESLA0000663	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
10	TESLA0000518	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
11	TESLA0000863-878	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

12	TESLA0000702-703	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
13	TESLA0000309	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
14	TESLA0000905-1013	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
15	TESLA0000063-5	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
16	TESLA0000175	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
17	TESLA0000200	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
18	TESLA0000309	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
19	TESLA0000371	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
20	TESLA0000389	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
21	TESLA0000299	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
22	TESLA0000408-421	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
23	TESLA0000422-466	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
24	TESLA0000467-481	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
25	TESLA0000676	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
26	TESLA0000679	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

1	27	TESLA0000684	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
2	28	TESLA0000686	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
3	29	TESLA0000688	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
4	30	TESLA0000716	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
5	31	TESLA0000725	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
6	32	TESLA0000729	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
7	33	TESLA0000751	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
8	34	TESLA0000762	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
9	35	TESLA0000776-8	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
10	36	TESLA0000779-801	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
11	37	TESLA0000802	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
12	38	TESLA0000805-8	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
13	39	TESLA0000809-15	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
14	40	TESLA0000818	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
15	41	TESLA0000819-824	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

42	TESLA0000842-3	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
43	TESLA0000844-51	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
44	TESLA0000825-41	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
45	TESLA0000852-62	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
46	TESLA0000879-88	Defendant Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Publicizing these documents would violate the Protective Order entered in this case [Dkt. No. 50].

DATED: December 9, 2019 By: /s Lawrence Organ
Lawrence A. Organ, Esq.
Navruz Avloni, Esq.
J. Bernard Alexander, Esq.
Attorneys for Plaintiffs
DEMETRIC DI-AZ AND OWEN DIAZ